

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket No. 5

**CERTIFICATION OF COUNSEL REGARDING ORDER (A) AUTHORIZING,
BUT NOT DIRECTING, THE DEBTORS TO (I) CONFIRM, RESTATE,
AND ENFORCE THE WORLDWIDE AUTOMATIC STAY, ANTI-
DISCRIMINATION PROVISIONS, AND *IPSO FACTO* PROTECTIONS
OF THE BANKRUPTCY CODE, AND (II) USE, FORM AND MANNER
OF NOTICE, AND (B) GRANTING OTHER RELATED RELIEF**

The undersigned hereby certifies as follows:

1. On June 27, 2023, the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) filed the *Debtors’ Motion for Entry of an Order (A) Authorizing, but not Directing, the Debtors to (I) Confirm, Restate, and Enforce the Worldwide Automatic Stay, Anti-Discrimination Provisions, and Ipso Facto Protections of the Bankruptcy Code and (II) Use, Form and Manner of Notice, and (B) Granting Other Related Relief* [Docket No. 5] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

“**Court**”). Attached thereto as **Exhibit A** was a proposed form of order granting the relief requested in the Motion (the “**Proposed Order**”).

2. On June 28, 2023, Karma Automotive LLC (“**Karma**”) filed the *Limited Objection to Debtor’s Motion for Order Confirming, Restating, and Enforcing the Automatic Stay* [Docket No. 50].

3. Also on June 28, 2023, the Court held an initial hearing (the “**First Day Hearing**”) in these chapter 11 cases. At the First Day Hearing, the Court indicated that it would approve the Proposed Order, subject to certain revisions being made thereto.

4. Consistent with the record made at the First Day Hearing, the Debtors have prepared a revised version of the Proposed Order (the “**Revised Order**”), and such Revised Order is attached hereto as **Exhibit 1**. For the convenience of the Court and all parties in interest, a redline comparison of the Revised Order marked against the Proposed Order is attached hereto as **Exhibit 2**.

5. A copy of the Revised Order has been circulated to the Office of the United States Trustee for the District of Delaware and Karma, and the aforementioned parties do not object to the entry of the Revised Order.

[Remainder of page intentionally left blank]

WHEREFORE, the Debtors respectfully request that the Revised Order, substantially in the form attached hereto as **Exhibit 1**, be entered at the earliest convenience of the Court.

Dated: June 29, 2023

Respectfully submitted,

/s/ Amanda R. Steele

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